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VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *In the Matter of Notice of Rulemaking Amendment of Regulations for Telephone Service Providers*
Docket No. 00-00873

Dear Mr. Waddell:

In addition to the consensus comments from the Industry with respect to the proposed rules, with which BellSouth agrees, BellSouth is submitting additional suggested revisions regarding proposed rules that will be addressed during Workshop I as follows.

BellSouth's proposed revisions are indicated by either striking through language that should be deleted from the proposed rules or by underlining language that should be added to the proposed rules.

1220-4-2-.03(5) – Exchange Maps

ETCs shall file with the Authority an exchange area map for each of its exchanges within the state clearly showing the boundary line sufficient in detail to reasonably permit locating the exchange service area in the field. Each telecommunications service provider which is not an ETC shall file with the Authority information in sufficient detail to inform the Authority of its service area in such a manner to reasonably permit locating its service area in the field.

1220-4-2-.03(9) – Adequacy of Service Reports

Each ~~ETC~~ telecommunications service provider shall submit to the Authority quarterly reports, in a format established by the Authority in cooperation with telecommunications service providers, that will allow the Authority to determine how well it is complying with the adequacy of service standards found in 1220-4-

2-.17. The reports shall be itemized by month ~~by local exchange~~ at the statewide level. The Authority may conduct periodic audits or require the ETCs to hire an independent firm to verify accuracy of service standard reporting.

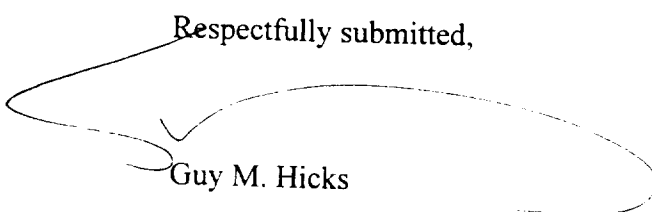
1220-4-2-.09 - Directories (White Pages)

~~(9) Telecommunications service providers publishing White Page Directories must provide the opportunity to competitive local exchange carriers offering service within the calling scope of a directory to contract for the appearance of the competitive local service providers name and logo on the cover of such directories under the same terms and conditions as the telephone service provider provides to itself.~~

BellSouth submits that this section should be deleted in its entirety. With its proposed rule 1220-4-2-.09 (9), the TRA seeks to do by rule what it is prohibited from doing by virtue of a stay entered by the Tennessee Court of Appeals, which prohibits the TRA from enforcing two separate orders entered by the TRA in contested case proceedings in 1998. The question of the enforceability of the 1998 Orders, and thus the legality of this proposed cover rule, is presently before the Tennessee Court of Appeals in appeals that have been fully briefed and argued by the parties. The proposed cover rule is subject to, and would violate, the Stay Pending Appeal. Moreover, the stay would otherwise be frustrated and mooted by the TRA's actions.

We look forward to working with the Authority Staff on these proposed rules.

Respectfully submitted,



Guy M. Hicks

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